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Dear Campus Leaders:

As the 2023-2024 school year begins, ADL (the Anti-Defamation League), in consultation with our partners (in alphabetical order) at Alpha Epsilon Phi, Alpha Epsilon Pi, Chabad on Campus International, Hillel International, Jewish Grad Organization, Olami, Sigma Alpha Mu, Sigma Delta Tau, and Zeta Beta Tau, would like to share our recommendations for campus administrators, consistent with the U.S. National Strategy to Counter Antisemitism (National Strategy) released by the Biden-Harris Administration earlier this year, to help create an inclusive, welcoming, and safe environment on campus for Jewish students at a time of rising antisemitism in higher education and across the globe.¹

Antisemitism poses a threat not only to the Jewish community, but to all marginalized communities. Hatred of Jews is often intertwined with other forms of hate, such as racism, anti-Muslim bigotry, anti-LGBTQ+ animus, and misogyny, and it is often fueled by dangerous conspiracy theories that threaten our most cherished democratic values. As spelled out in the National Strategy, we all have a role to play in confronting antisemitism early and aggressively, whenever and wherever it emerges. This whole-of-society approach will require bold and transformative action by leaders in every sector, but especially leaders on college and university campuses. We urge you to carefully review not only the recommendations outlined below, but all suggestions and calls to action for schools and colleges as set forth in the Strategy itself.² We look forward to continuing to be a critical resource to you in this work.

Recommendation #1: Define Antisemitism on Campus

As set forth in the National Strategy, antisemitism is a complex and nuanced form of oppression that is often not well understood. This is in large part because antisemitism is more than just a form of religious bigotry. In fact, contemporary manifestations of antisemitism are rarely rooted in religious bias. Rather, antisemitism today often takes the form of a **racialized bigotry** (e.g., swastikas, Nazi salutes, Holocaust jokes based on white supremacist ideology), or bigotry grounded in **conspiracy theories** (e.g., conspiracies featuring myths about **Jewish power and control**). And it can also manifest in the form of

Nearly one-third of Jewish students report personally experiencing antisemitism directed at them on the campus of an institution of higher education or by a member of the campus community, according to a 2021 study. The ADL-Hillel Campus Antisemitism Survey: 2021.

^{2.} National Strategy, at p. 42-43.

anti-Zionist³ harassment or discrimination (e.g., excluding Jewish students from campus activities or subjecting them to academic bias based on their actual or perceived historic, cultural, religious, and/or ethnic identification with Israel).

While there is no exhaustive definition of antisemitism, as it can take many forms, the International Holocaust Remembrance Alliance (IHRA) Working Definition has become the preeminent definitional and learning tool in understanding manifestations of antisemitism today, and it includes useful examples of discriminatory anti-Israel acts that cross the line into antisemitism. The U.S. Department of Education is required to consider the IHRA definition when investigating complaints of antisemitic discrimination on college and university campuses. The IHRA definition is also used by over 1,100 other governments, universities, NGOs, and other key institutions, demonstrating a substantial and clear worldwide consensus.

We urge you to endorse the IHRA Working Definition of Antisemitism and rely on it when investigating reports of antisemitic harassment and discrimination on your campus.

Recommendation #2: Educate Students, Faculty and Administrators About Antisemitism on Campus

Antisemitism, despite its persistence across the globe over the course of centuries, is commonly misunderstood – including on college and university campuses across the United States today. It is also sometimes overlooked in programming focused on equity, inclusion, and non-discrimination protections.⁵ This is particularly concerning at a time of rising incidents on campus. According to ADL's most recent **Audit of Antisemitic Incidents**, for example, in 2022 there was a 41% increase in reported incidents on college campuses across the U.S. These historically high levels of reported antisemitism are buoyed by rising rates of belief in antisemitic tropes and conspiracy theories. ADL's recent **Antisemitic Attitudes in America** survey found that 20% of Americans hold extensive anti-Jewish beliefs, up from 11% just a few years ago.

As a result, ADL and Hillel International have partnered to create a variety of free resources that focus on understanding Judaism, Jewish identity, the history of antisemitism, and manifestations of antisemitism today. ADL also has a wealth of resources available on its website focused on the latest trends and best practices for responding to antisemitism and hate on campus. In addition, Hillel International's Campus Climate Initiative (CCI) provides higher education administrators assessment tools, training, resources and peer consultation to support them in fostering a positive, affirming campus climate in which Jewish students feel comfortable expressing their identity and values, free from antisemitism, harassment, or marginalization.⁶

- 3. Zionism is the movement for self-determination and statehood of the Jewish people in their ancestral homeland, the land of Israel. For most Jews, a connection to Israel is an intrinsic part of their identity. A 2021 Pew Research Center Survey of Jewish Americans found that at least 80% of American Jews say that Israel is an essential part of their Jewish identity.
- 4. Executive Order 13899 Combatting Anti-Semitism.
- 5. The National Strategy calls upon colleges and universities to "ensure efforts to prevent and address antisemitism are integrated into their DEIA [Diversity, Equity, Inclusion, and Accessibility] programs, including into mandatory trainings on discrimination and harassment." National Strategy, at p. 43.
- 6. This cohort-based program offers senior campus administrators a unique opportunity to assess their current campus climate with robust data so that they can develop a tailored action plan that will enhance Jewish students' sense of belonging.



We urge you to formally include antisemitism awareness education in new student orientation programming, DEI programming, and training on discrimination and harassment, and to conduct annual mandatory trainings for campus leadership and administrators on antisemitism and best practices in response.

Recommendation #3: Review Your Obligations under Title VI

Title VI of the Civil Rights Act of 1964 (Title VI) protects all students, including Jewish students, from discrimination and harassment based on race, color, or national origin. This includes students who experience discrimination based on their actual or perceived shared ancestry or ethnic characteristics, or citizenship or residency in a country with a dominant religion or distinct religious identity. Consistent with these obligations, we would encourage you to review the most recent **Dear Colleague Letter** from the U.S. Department of Education's Office for Civil Rights (OCR) on schools' obligations under Title VI to address discrimination against Jewish students. OCR has additional Fact Sheets on **Protecting Students from Discrimination Based on Shared Ancestry or Ethnic Characteristics** and **Combating Discrimination Against Jewish Students** which provide specific examples of school action or inaction that could potentially violate Title VI, and you may find OCR's **Questions and Answers on Executive Order 13899 (Combating Anti-Semitism) and OCR's Enforcement of Title VI of the Civil Rights Act of 1964 to be particularly useful.**

Consistent with the National Strategy, OCR intends to launch an Antisemitism Awareness Campaign aimed at raising awareness among educators, students, parents, and communities about the alarming rise of antisemitism and giving them tools to address it.⁷ OCR will also continue to vigorously enforce Title VI, including by taking allegations of a college or university's failure to address antisemitic harassment seriously.

For example, in April 2023, OCR and the University of Vermont (UVM) entered into a **Resolution Agreement** in response to allegations that UVM failed to adequately respond to antisemitic harassment, including the reported online harassment against Zionist Jewish students by a teaching assistant and the targeting of the UVM Hillel building. The investigation confirmed that the University's responsive steps were delayed; not designed to rectify concerns regarding the existence of a hostile environment; and may have discouraged students and staff from raising further concerns with the University regarding antisemitic harassment. To resolve the investigation, the University made a commitment to review and revise its policies and procedures to include a description of forms of discrimination that can manifest in the university environment, to train university staff and leadership on Title VI's prohibition against harassment based on national origin, and to submit for Federal review copies of case files of complaints of antisemitism.

We urge you to review your obligations under Title VI (and other similar state laws) to protect Jewish students from antisemitic harassment on campus; to take full advantage of OCR's technical assistance, resources, and trainings regarding Title VI; and to educate students and administrators regarding the same.

Recommendation #4: Ensure Accommodations for Jewish Students on Campus

In order to create welcoming and inclusive school environments, and consistent with the National Strategy, campuses should make diligent efforts to "enhance awareness of religious cultures and practices[]" and to "ensur[e] accommodation of religious observances, including Jewish observances" to "help[] Jewish students feel included on campus." Religious accommodation policies should cover food and dining services as well







as housing and residence life needs, and should also encourage professors, athletic directors, and other programmatic heads to avoid scheduling major events (commencement, exams, tryouts, etc.) on the Jewish Sabbath and major holidays including the Jewish High Holidays, Rosh Hashanah and Yom Kippur. By way of example only, there have been instances where the first day of college has been scheduled to commence on Rosh Hashanah, one of Judaism's holiest days. Being mindful of all students' religious observances is one simple way to promote respect for diversity and create inclusive school environments. ADL's Calendar of Observances is a helpful tool for avoiding these types of conflicts.

We urge you to review and update your campus's religious accommodations policy to ensure that all students, regardless of their faith, have equitable access to university programs, services, and activities.

Recommendation #5: Ensure Comprehensive Policies & A Robust Process for Responding to Antisemitism on Campus

On college and university campuses today, it is critical to have clear and transparent non-discrimination and anti-harassment policies; clear and transparent mechanisms for students to report hate incidents and acts of antisemitism to campus administrators; and clear and transparent communication from campus leadership regarding steps taken in response to reported incidents. The National Strategy calls upon colleges to "have a clear and transparent mechanism for students to report hate incidents and acts of antisemitism" which "include[s] resources for students who have been the victims of intimidation, undue harassment, or violence on the basis of being Jewish or perceived as Jewish." ¹⁰ If your existing equal opportunity and/or anti-discrimination policies do not already include prohibitions on discrimination or harassment based on shared ancestry and ethnic characteristics, we urge you to revise those policies accordingly, and to issue new, updated guidance consistent with federal Department of Education OCR recommendations.

We urge you to review and update your campus's non-discrimination and harassment policies to ensure that discrimination based on shared ancestry and ethnic characteristics is covered; and to take steps to ensure full transparency regarding these policies, as well as the policies and procedures in place for responding to reported incidents on campus.

Recommendation #6: Create a Task Force or Advisory Council on Jewish Life on Campus

If your campus does not have one already, we encourage you to create a Task Force or Advisory Council to review, address, and improve Jewish life on campus. This Task Force or Advisory Council should be composed of Jewish student leaders, faculty, staff, and other concerned stakeholders who will provide recommendations to administrators on how to best support Jewish students, faculty, and staff, including how to counter antisemitism on campus. Consistent with this recommendation, we encourage you to:

• Bring ADL's **Words to Action** program to Jewish groups on campus, providing an opportunity for Jewish students to connect around Jewish identity and gain common tools for recognizing antisemitism on campus.



^{9.} Such policies could require training for dining staff regarding dietary needs within different religious traditions, describe different stations within a college's dining facilities to accommodate dietary needs (like a kosher station), and provide information about how the school labels halal food options within the main dining options.

- Participate in Hillel International's Campus Climate Initiative (CCI), as described above, and partner
 with campus Hillel professionals in order to increase your administration's knowledge about
 contemporary antisemitism and to develop concrete action plans for supporting Jewish students within
 the context of broader DEIA initiatives.
- Take advantage of ACT through Chabad on Campus and Chabad House Directors as a resource for Jewish students who experience discrimination as well as for the university and student body at large.
- Consult and partner with campus chapters of Jewish students and supporting organizations in conversations regarding Jewish life and antisemitism on campus to ensure you are centering Jewish students in your effort.

We urge you to create a task force or advisory council on Jewish life on campus, and to participate in or promote ADL, Hillel International and Chabad on Campus programming to ensure a positive campus climate in which Jewish students feel comfortable expressing their identity.

Recommendation #7: Speak Out & Take Action When Antisemitism Takes Place

The National Strategy calls upon colleges to "issue clear and unwavering statements condemning all forms of hate, including antisemitism, especially in the wake of antisemitic incidents" and to "treat antisemitism with the same seriousness as other forms of hate."¹¹ When your campus experiences an antisemitic incident, one of the most important steps that campus leadership can take is to call it out swiftly, clearly, and specifically. And when Jewish and Zionist students are subjected to a hostile environment based on harassment, discrimination, or exclusion, we urge you to issue unequivocal statements in support of those students, making clear that such actions are harmful and directly contrary to the values of your university, and will be investigated and dealt with accordingly. Antisemitic behavior, regardless of the source and regardless of whether or not it constitutes protected speech, causes real harm – not simply hurt feelings – to both the targeted student(s) and the community as a whole.

We urge you to speak out strongly and unequivocally in the wake of antisemitic incidents on campus.

Recommendation #8: Prepare for Antisemitic Speakers and Events

When controversial speakers are invited to campus and espouse antisemitic views or beliefs, university administrators have a responsibility to use their own expressive rights to challenge and confront this rhetoric vociferously, immediately, and directly. Just as speakers in most circumstances have a constitutional right to express their views, campus administrators have a First Amendment right to counter hateful messages and a responsibility to ensure the safety and well-being of students on their campus. In some cases, however, university administrators may need to take additional steps. This may include, but is not limited to, delineating event-specific safety protocols and procedures, supporting students in hosting a separate event at another location on campus that coincides with the controversial speaking engagement; creating special "office hours" during which Jewish students can seek support from university administrators; and/or planning antisemitism awareness programming in the wake of the event. A useful guide can be found here.



We urge you to review and, as needed, update your policies and protocols regarding how best to support students when there are antisemitic or other hateful speakers and/or events on campus.

ADL and our partners would welcome the opportunity to discuss these issues further and to shed additional light on the trends we are monitoring and best practices in response. We are here as partners and to serve as a resource as you continue to ensure your campus is safe and inclusive for all students and staff.

Sincerely,

Jonathan Greenblatt

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CEO and National Director, ADL

